

**UNITED STATES DISTRICT COURT  
OF PUERTO RICO  
CASE NO. 22-CR-00342-SCC-HRV**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

MARK T. ROSSINI,  
JULIO HERRERA VELUTINI,  
Defendants.

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**JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS  
TO MEMORANDUM AND ORDER AT ECF No. 819**

Mark Rossini (“Mr. Rossini” or “Rossini”) and Julio Herrera Velutini (“Mr. Herrera” or “Herrera”), through undersigned counsel, respectfully request an extension of time to file their objections to the Magistrate Judge’s Memorandum and Order entered at ECF No. 819, which denied their motions to compel identification of *Brady*, *Jencks*, and *Giglio* materials.

Pursuant to the applicable rules, objections to the Memorandum and Order are due today, March 26, 2025. Defendants intend to file objections and require additional time to finalize and coordinate the joint filing. Accordingly, Defendants respectfully request a one-week extension, through April 2, 2025, to submit their objections.

This is the first request for an extension relating to this filing, and the additional time is sought in good faith and not for the purpose of delay. Undersigned counsel have been diligently working on the objections and

believe the additional time will ensure a complete and accurate presentation of the issues for the Court's de novo review under 28 U.S.C. § 636(b)(1).

Assistant U.S. Attorney, Nicholas Cannon, does not object to this request and requests that any extension also be applied to the government.

**WHEREFORE**, Defendants respectfully request that the Court grant an extension of time until April 2, 2025 to file their objections to the Memorandum and Order at ECF No. 819.

Respectfully submitted,

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*Attorneys for Mark T. Rossini*

### **CERTIFICATE OF SERVICE**

I certify that on March 26, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

/s/ Juan J. Michelen  
Juan J. Michelen